

Baker & Hostetler LLP

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Heather J. McDonald

Email: hmcdonald@bakerlaw.com

*Attorneys for Irving H. Picard, Esq., as Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

SAGE REALTY;

LILLIAN M. SAGE, IN HER CAPACITY AS PARTNER
OR JOINT VENTURER OF SAGE REALTY AND
INDIVIDUALLY AS BENEFICIARY OF SAGE

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04400 (SMB)

REALTY;

MALCOLM H. SAGE, IN HIS CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE REALTY,
INDIVIDUALLY AS BENEFICIARY OF SAGE
REALTY, AND AS THE PERSONAL
REPRESENTATIVE OF THE ESTATE OF LILLIAN M.
SAGE;

MARTIN A. SAGE, IN HIS CAPACITY AS PARTNER
OR JOINT VENTURER OF SAGE REALTY AND
INDIVIDUALLY AS BENEFICIARY OF SAGE
REALTY;
AND

ANN M. SAGE PASSER, IN HER CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE REALTY
AND INDIVIDUALLY AS BENEFICIARY OF SAGE
REALTY,

Defendants.


FOURTH AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures were served by: December 21, 2015.
2. Fact Discovery shall be completed by: April 6, 2018
3. The Disclosure of Case-in-Chief Experts shall be due: July 11, 2018
4. The Disclosure of Rebuttal Experts shall be due: September 19, 2018
5. The Deadline for Completion of Expert Discovery shall be: October 31, 2018
6. The Deadline for Service of a Notice of Mediation Referral shall be: November 14, 2018
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: November 28, 2018.

8. The Deadline for Conclusion of Mediation shall be: March 20, 2019.

Dated: January 23, 2018
New York, New York

By: 
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Heather J. McDonald
Email: hmcDonald@bakerlaw.com

BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Esq., as Trustee for the
Substantively Consolidated SIPA Liquidation of Bernard
L. Madoff Investment Securities LLC and Estate of
Bernard L. Madoff*



Consented To:

Andrew B. Kratenstein

McDermott Will & Emery LLP
340 Madison Avenue
New York, NY 10173-1922
Telephone: (212) 547-5695
Facsimile: (212) 547-5444

Attorneys for Defendants